

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

LIBERTY MUTUAL PERSONAL
INSURANCE COMPANY; LM GENERAL
INSURANCE COMPANY; AMERICAN
ECONOMY INSURANCE COMPANY; and
SAFECO INSURANCE COMPANY OF
ILLINOIS,

Plaintiffs,

v.

ACCURATE CARE, L.L.C.; NOVAMED
L.L.C.; COMPLETE FITNESS & RHB,
LLC; NERVEANA, LLC; NON OPIOID
RELIEF LLC; TRANSCARE DETROIT
INC; and ALLAN SCHWARTZ, D.O.,

Defendants.

C.A. No. 4:24-cv-12830-FKB-KGA

STIPULATION OF DISMISSAL WITH PREJUDICE
AS TO ALL DEFENDANTS

Pursuant to Fed. R. Civ. P. 41(a)(1), it is hereby stipulated and agreed by and between plaintiffs Liberty Mutual Personal Insurance Company, LM General insurance Company, American Economy Insurance Company, and Safeco Insurance Company of Illinois (collectively, “Liberty Mutual”) and defendants Accurate Care, L.L.C., Novamed L.L.C., Complete Fitness & RHB, LLC, Nerveana, LLC, Non Opioid Relief LLC, Transcare Detroit Inc, and Allan Schwartz, D.O. (collectively,

the “defendants”) by and through their undersigned counsel, that Liberty Mutual’s Complaint (*ECF No. 1*) be dismissed with prejudice as to the defendants, without costs or fees of any kind to any party. It is hereby agreed by and between Liberty Mutual and the defendants that this Court shall retain jurisdiction to enforce the terms of settlement reached between Liberty Mutual and the defendants.

STIPULATED AND AGREED TO THIS 16th DAY OF JUNE, 2025:

<p><i>Liberty Mutual Personal Insurance Company, LM General Insurance Company, American Economy Insurance Company, and Safeco Insurance Company of Illinois,</i></p> <p>By their Attorneys,</p> <p>/s/ <u>Andrew H. DeNinno</u> Andrew H. DeNinno (P87678) adeninno@ktmpc.com Brad A. Compston bcompston@ktmpc.com KTM 38777 Six Mile Road, Suite 314 Livonia, MI 48152 (734) 521-9000</p>	<p><i>Accurate Care, L.L.C., Novamed, L.L.C., Complete Fitness & RHB, LLC, Nerveana, LLC, Non Opioid Relief, LLC, Transcare Detroit, Inc., and Allan Schwartz, D.O.,</i></p> <p>By their Attorneys,</p> <p>/s/ <u>Nathan J. Fink</u> Nathan J. Fink (P75185) nfink@finkbressack.com 38500 Woodward Avenue, Suite 350 Bloomfield Hills, MI 48304 (248) 971-2500</p>
---	---

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

LIBERTY MUTUAL PERSONAL
INSURANCE COMPANY; LM GENERAL
INSURANCE COMPANY; AMERICAN
ECONOMY INSURANCE COMPANY; and
SAFECO INSURANCE COMPANY OF
ILLINOIS,

Plaintiffs,

v.

ACCURATE CARE, L.L.C.; NOVAMED
L.L.C.; COMPLETE FITNESS & RHB,
LLC; NERVEANA, LLC; NON OPIOID
RELIEF LLC; TRANSCARE DETROIT
INC; and ALLAN SCHWARTZ, D.O.,

Defendants.

C.A. No. 4:24-cv-12830-FKB-KGA

STIPULATED ORDER OF DISMISSAL WITH PREJUDICE
AS TO ALL DEFENDANTS

This matter having come before the Court upon stipulation of the parties, and
the Court being otherwise fully advised in the premises:

IT IS HEREBY ORDERED that plaintiffs' causes of action against
defendants Accurate Care, L.L.C., Novamed L.L.C., Complete Fitness & RHB,
LLC, Nerveana, LLC, Non Opioid Relief LLC, Transcare Detroit Inc, and Allan
Schwartz, D.O. are hereby dismissed with prejudice and without costs to any party.

The Court shall retain jurisdiction over this matter to enforce the terms of settlement reached between these parties.

IT IS SO ORDERED.

Dated: June 17, 2025

s/F. Kay Behm
F. Kay Behm
United States District Judge